

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Chapter 11
)
EBRO FOODS, INC.) Judge Eugene R. Wedoff
)
Debtor and Debtor in Possession.) Case No. 09-10101
)
) Hearing: October 20, 2009 at 9:30 a.m.

NOTICE OF MOTION

To: See attached service list

PLEASE TAKE NOTICE that I will appear on October 20, 2009 **at 9:30 a.m.** before the Honorable Eugene R. Wedoff, or any other Judge sitting in his stead, in Courtroom 744, Dirksen Federal Building, 219 S. Dearborn St., Chicago, IL, and will then and there present this MOTION TO EXTEND DEADLINE TO FILE PLAN AND DISCLOSURE STATEMENT, a copy of which is enclosed and is herewith served upon you, and at which time and place you may appear and be heard.

/s/ Forrest L. Ingram
One of Debtor's attorneys

Forrest L. Ingram, P.C.
Forrest L. Ingram #3129032
Peter L. Berk
Michael V. Ohlman
79 W. Monroe St., Suite 900
Chicago, IL 60603
(312) 759-2838

CERTIFICATE OF SERVICE

I, Philip Groben, a non-attorney, certify that I caused a true and correct copy of the above and foregoing Notice and the document, to which it refers, on all parties entitled to service, by electronic filing through ECF, or by regular U.S. mail, as set forth on the attached service list, at or before on October 13, 2009.

/s/Philip Groben

SERVICE LIST

VIA CM/ ECF

William T Neary

Office of the U.S. Trustee, Region 11
219 S Dearborn St, Room 873
Chicago, IL 60604

Bank of America

Dykema Gossett PLLC
Morgan M. Smith
10 S. Wacker Dr. Suite 2300
Chicago, IL 60606

Metropolitan Water Reclamation District of Greater Chicago

c/o Barry A. Chatz
Arnstein & Lehr LLP
120 South Riverside Plaza, Suite 1200
Chicago, IL 60606

Environmental Services, Inc.

Esposito & Staubus
7055 Veterans Blvd., Unit B
Burr Ridge, IL

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NOW COMES Debtor, EBRO FOODS, INC. (the "Debtor"), by and through its attorneys at Forrest L. Ingram, P.C., and for its Motion to Extend Time to File Plan and Disclosure Statement, states as follows:

1. On March 24, 2009, the Debtor filed a voluntary case under Chapter 11 of the United States Code ("Bankruptcy Code").
2. On May 5, 2009, this Court entered an order setting September 4, 2009 as a deadline for Debtor to file its Disclosure Statement and Plan. This order also set a status on Disclosure Statement and Plan for September 9, 2009 at 10:00 a.m.
3. On September 9, 2009, this Court extended the time for Debtor to file its Disclosure Statement and Plan for October 13, 2009.
4. Debtor's Vice President, Silvio Vega, needs time to complete negotiations with Debtor's secured creditors and has already obtained necessary concessions from certain creditors.
5. Upon successful negotiations with its secured creditors, the Debtor will be able to propose a more feasible plan which will assure its success in reorganization efforts.
6. Debtor's lead counsel, Forrest Ingram, will be out of town and therefore unavailable from October 20, 2009 through October 26, 2009.

7. Therefore, Debtor will need additional time to file its Plan and Disclosure Statement on or before November 10, 2009.

WHEREFORE, Debtor respectfully requests that this Court enter an order extending time to file Debtor's Plan and Disclosure Statement until November 10, 2009, and for such other and further relief as this court may deem just.

Respectfully submitted,
EBRO FOODS, INC.

By: /s/ Forrest L. Ingram
One of its attorneys

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